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February 9th, 2022

Via ECF

Hon. John G. Koeltl
United States Courthouse
500 Pearl Street, Room 14A
New York, NY 10007

Re: Joint Letter Concerning February 1st, 2022 Pre-Motion Conference
Espire Ads LLC, *et al.* v. Tapp Influencers Corp., *et al.*
Civil Action No. 21-cv-10623 (JGK)
Tapp Market Influencers LLC, *et al.* v. Espire Ads LLC, *et al.*
Civil Action No. 21-cv-11068 (JGK)

Your Honor:

We hope this finds you well. Please be advised that this firm continues representing all plaintiffs in the earlier matter and all defendants in the later matter. We write jointly with counsel for defendants in the earlier matter and plaintiffs in the later matter pursuant to Your Honor's directive at the February 1st, 2022 pre-motion conference to inform the Court of the following:

- The parties were unable to agree on consolidation of the related cases and/or discontinuance of the later matter with leave to assert all counterclaims and joinder of any and all third-parties in the earlier matter;
- The parties each intend to join additional parties, but are not authorized to accept service of process on such additional parties' behalf;
- However, the parties have agreed on mutual leave to amend the respective pleadings on or before February 28th, 2022 without prejudice to any and all rights accorded under the Fed. R. Civ. P.; and
- The parties have agreed to a briefing schedule for any and all pre-answer motion practice on or before April 30th, 2022, with opposition thereto due on or before May 30th, 2022, and reply due on or before June 30th, 2022.

Best regards,

/s/ ZACHARY G. MEYER, ESQ.
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